

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Qwest Communications)	
International Inc.)	WC Docket No. 02-314
)	
Consolidated Application for Authority)	
to Provide In-Region, InterLATA)	
Services in Colorado, Idaho, Iowa)	
Montana, Nebraska, North Dakota)	
Utah, Washington, and Wyoming)	

REPLY DECLARATION OF KAREN A. STEWART

**Checklist Item 4 of Section 271(c)(2)(B):
Line Sharing**

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TABLE OF EXHIBITS

Exhibit	Description
Reply Exhibit KAS-1	Qwest's October 16, 2002 Ex Parte on Router Testing

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REPLY DECLARATION OF KAREN A. STEWART

**Checklist Item 4 of Section 271(c)(2)(B):
Line Sharing**

Pursuant to 47 C.F.R. § 1.16, Karen A. Stewart declares as follows:

1. My name is Karen A. Stewart. My office is located at 421 SW Oak Street, Portland, Oregon. I am a Senior Staff Advocate, Policy and Law for Qwest. I am currently a member of the Qwest Policy and Law organization responsible for representing Qwest in a number of Section 271 workshops related to Qwest's provisioning of various unbundled network elements ("UNEs"). I am the same Karen A. Stewart who filed declarations on behalf of Qwest in the Qwest I and Qwest II proceedings.

2. The purpose of this Declaration is to address issues raised in the comments of Covad, WorldCom, and Touch America concerning line sharing issues.

I. RESPONSES TO LINE SHARING ISSUES RAISED BY COMMENTERS

A. Service Order Completions

3. WorldCom claims that Qwest is sending service order completion notices (“SOCs”) before provisioning work is completed.^{1/} Qwest addresses this issue primarily in the declaration of Lynn M. V. Notarianni and Christie L. Doherty, attached to these reply comments.^{2/} With respect to line sharing specifically, however, Qwest believes that it is important to reiterate that the premature SOC issue raised by WorldCom has been resolved.

4. As Qwest described in its reply comments in the Qwest II proceeding, Qwest has introduced additional controls, provided retraining for its technicians, and instituted a compliance checklist for technicians to follow when performing work on line sharing orders.^{3/} Qwest initiated process controls that provide central office managers with a daily report of line sharing orders that were not completed by the assigned due date and which did not receive a jeopardy code.

^{1/} WorldCom Qwest III Comments at 15-16.

^{2/} Reply Declaration of Lynn M. V. Notarianni and Christie L. Doherty, Operations Support Systems, Qwest III, Section III.B.

^{3/} Reply Declaration of Karen A. Stewart, Qwest II, at 18-22.

Qwest also initiated a cross-check to the existing process to prevent line sharing orders from completing prior to the installation work being properly performed by the technician. This internal quality control step calls for identification of all line sharing orders that are not complete by 4:00 p.m. local time. As described in the Qwest II reply comments, since the implementation of these process changes, the issuance of SOC's on line sharing orders that have not been completed by the technician in the central office has become a rarity. In short, the premature SOC issue is resolved as it affected line sharing.

B. Router Testing

5. In addition to eliminating problems with premature SOC's for line sharing, Qwest also has resolved the issue of CLEC-requested router testing for line sharing by agreeing to conduct such testing. As described in an ex parte filed with the Commission on October 16, 2002, Qwest has agreed to develop a router testing option as part of its line-shared loop provisioning process. A copy of this ex parte is attached as Reply Exhibit KAS-1. Qwest has committed to performing the same physical layer continuity router testing for line-shared loop provisioning that it provides to itself in any central office in which Qwest has deployed or will deploy Qwest DSL in the future. Qwest has not proposed a charge for router testing, but reserves the right to propose alternate rate structures for line sharing in future rate proceedings.

6. In its comments in this proceeding, Covad expressed satisfaction with Qwest's decision to provide router testing for line-shared loops.^{4/} Qwest plans to make the router testing option available to CLECs in the first quarter of 2003, as Covad requested. The United States Department of Justice ("DOJ") noted in its report on this Application that by accommodating Covad's needs, Qwest would also satisfy the DOJ's concern that router testing be made available to CLECs.^{5/} Qwest believes that it has also addressed the concern expressed by Touch America about router testing.^{6/} This issue can therefore be considered closed.

C. Line Sharing Outages

7. Touch America describes Qwest's approach to line sharing outages as "lackadaisical."^{7/} This characterization is incorrect. Qwest has in fact taken concrete steps to address CLEC concerns about line sharing outages, as described in its original Application in this proceeding.^{8/} Qwest changed the manner in which it categorizes line sharing outages, so that line sharing and voice service outages are now treated comparably in Qwest's repair systems. Since this

^{4/} Covad Qwest III Comments at 2.

^{5/} Evaluation of the United States Department of Justice, Qwest III, at 8.

^{6/} Touch America Qwest III Comments at 25.

^{7/} *Id.*

^{8/} Qwest III Addendum, Tab 14, at 1-2.

change took effect in July, Qwest's performance under the relevant maintenance and repair performance measures (or "PIDs") has indeed improved.^{9/}

8. Furthermore, Qwest has every reason to believe that its maintenance and repair performance for line sharing will continue to improve. As described in Qwest's Application in this proceeding, Qwest has undertaken an exploration of the extent to which Qwest's commercial performance for line sharing is affected by the fact that CLECs do not always accept the first available repair appointment, but sometimes request a later appointment time.^{10/} As a result of this exploration, Qwest identified a glitch in its systems that caused a discrepancy between a CLEC's requested future meet time and the meet time reflected in Qwest's systems. Qwest has developed a manual solution to eradicate this glitch^{11/} and is currently developing a mechanized solution. Qwest has every incentive to complete this solution quickly. In effect, Qwest has been penalized by the fact that PIDs designed to measure Qwest's responsiveness to repair requests have previously included delays that were not Qwest's fault, but rather were the result of CLECs requesting later appointment times.

^{9/} Qwest Regionwide Commercial Performance Results, September 2002, at 238-42 (MR-4, MR-6).

^{10/} Qwest III Addendum, Tab 8, at 1-2.

^{11/} Qwest notified CLECs of this resolution on October 10, 2002.

9. Touch America provides no specific allegations about problems it has had with Qwest's line sharing offering, and no other CLEC addressed this issue in comments filed in this proceeding. Qwest therefore believes that the issue is closed.

II. CONCLUSION

10. In summary, Qwest has endeavored to address the concerns about line sharing that CLECs expressed in this proceeding and in the Qwest I and Qwest II proceedings. As a result, none of the issues described in this Declaration should prevent the Commission from approving Qwest's Application.

11. This concludes my Reply Declaration.

VERIFICATION

I declare under penalty of perjury that the foregoing is true and correct.

Karen A. Stewart

Executed on October ____, 2002.